

Procure-to-Pay Capability Summary

PUBLICATION DATE: July 2, 2019

SUBJECT: Unique Entity Identifier (UEI) for Awardees

BACKGROUND: Federal Acquisition Regulations (FAR) have long required a Unique Entity Identifier (UEI) to uniquely identify the successful offeror on a government contract action. Since the 1970s, the Federal government has used the DUNS® number, a proprietary number managed by the Dun and Bradstreet Corporation, as its UEI. In March 2019, the government announced its plans to move to a new Government-owned UEI. Government agencies that issue contracts or financial assistance actions will need to move to using the new UEI by the end of calendar year 2020. The pervasive use of DUNS® numbers in contracting, grants, logistics, and financial business systems, processes, and policies makes this a significant and time-sensitive requirement.

POLICY: FAR 4.605 requires contracting officers to “identify and report a unique entity identifier for the successful offeror on a contract action.” The UEI is first captured when the vendor registers in the System for Award Management (SAM). This system is mandated by FAR 4.11 as the central source of vendor information for use in contracting. Office of Management and Budget (OMB) Memorandum M-03-16 mandated a UEI to identify awardees of grants and other federal assistance awards in 2003. The UEI is also the identifier used by the federal government to comply with the DATA Act, among other statutory reporting requirements.

DATA STANDARDS: The final length and format of the new UEI is still under discussion by a federal requirements group as of May 2019. Standards will be published in FY19; it is expected to be 12 alpha-numeric with no special characters. The UEI will be mapped to other existing entity codes such as CAGE, TIN/EIN, and previously-assigned DUNS®. It is assumed that the business rules for the UEI will be essentially the same as for the DUNS® number (e.g. unique UEIs will be assigned for different physical locations and the CAGE code assignment/maintenance processes for SAM registrations will be similar).

INFORMATION TECHNOLOGY INFRASTRUCTURE: The new UEI will become the primary key to identify every entity record throughout SAM, other IAE systems, and downstream Government systems. The DUNS® will be phased out over time. All Integrated Award Environment (IAE) systems and extracts and APIs (e.g. FPDS Atom Feed, SAM API) will be updated to include the new UEI in addition to the historical DUNS®. The assignment of the UEI will be incorporated into the SAM registration process, eliminating the need for prospective awardees to seek external identifiers in order to register. The General Services Administration (GSA), who manages SAM, will at some point assign UEIs to all active registrations in SAM. During the transition, the DUNS® will continue to be issued alongside the new UEI. Agencies should not overwrite the DUNS® field with the UEI. GSA’s interface transition schedule is expected to be complete before Q2FY21.

IMPACT: DoD services/agencies must plan for the impact and switch over to the new UEI in all systems/processes. All contract writing systems as well as many downstream systems in logistics, finance, etc. that use the DUNS® number will need to prepare to accept and transmit the UEI in addition to the DUNS®. In addition, DATA Act and other Congressional reporting will need to include the UEI going forward. Agencies and their system program managers need to budget for the change in FY20.

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